

Decision Notice
and
Finding of No Significant Impacts
for the
Currant-Ellison Watershed Restoration Project

USDA Forest Service
Humboldt-Toiyabe National Forest
Ely Ranger District
White Pine and Nye Counties, Nevada

Introduction

In April of 2016, an Interdisciplinary Team completed the Currant Ellison Landscape Restoration Project Environmental Analysis in compliance with the National Environmental Policy Act (NEPA). The Environmental Assessment (EA) discloses the temporary, short and long term, direct, indirect, irretrievable, irreversible, and cumulative environmental impacts of the Proposed Action, No Action, and the No Treatments in Wilderness Areas Alternatives, for the Currant-Ellison Watershed Restoration Project. The EA is available on the Humboldt-Toiyabe National Forest's website.

To request a hard copy of the EA, please refer to the "Contact Information" section of this document.

The Humboldt-Toiyabe National Forest is proposing to restore native vegetative communities, enhance the diversity of age classes and structure of vegetation communities, restore and improve wildlife habitats, and reduce the severity of wildfires within a project area of approximately 185,000 acres.

Project Area Location

The project area is located on National Forest System lands on the Ely Ranger District. The area is approximately 185,000 acres in size and is located entirely within the White Pine Range Management Area. The project area is located approximately 30 miles southwest of the town of Ely, NV. The legal description for the project area is T14N, R57E; T14N, R58E; T14N, R59E; T14N, R60E; T13N, R57E; T13N, R58E; T13N, R59E; T13N, R60E; T12N, R57E; T12N, R58E; T12N, R59E; T12N, R60E; T11N, R58E; T11N, R59E; T11N, R60E in all or parts of the sections. A vicinity map is included on the next page (Figure 1).

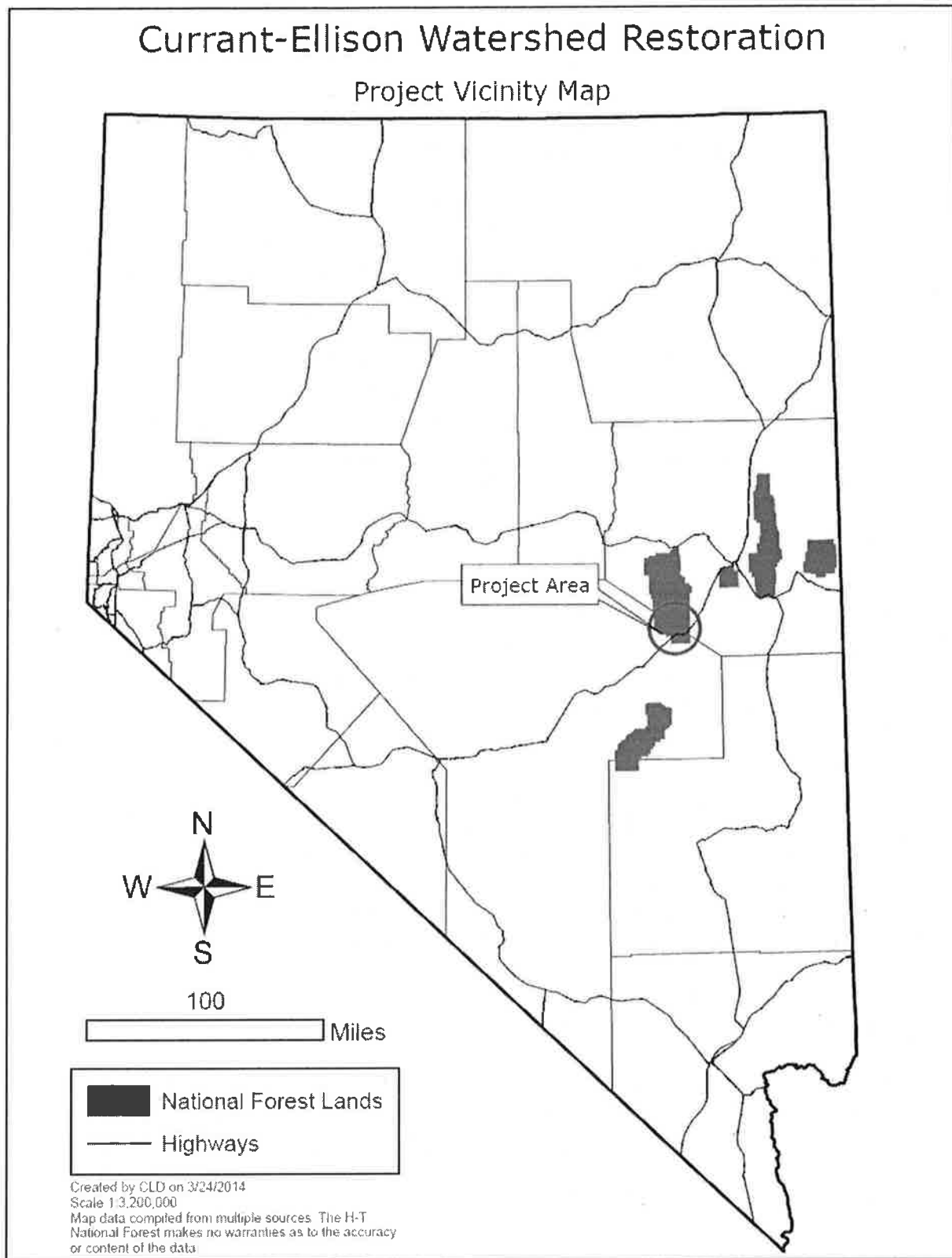


Figure 1. Project Vicinity Map

Purpose and Need

The purpose of this project is to restore and maintain healthy and resilient watershed functions by implementing projects that enhance and improve vegetation communities, wildlife habitats and water resources, while also reducing fuels that pose a high wildfire risk to private lands, structures and other resources. There is a need to:

- Improve and/or maintain habitats for a variety of wildlife species including sage grouse, bighorn sheep, mule deer and sagebrush dependent species.
- Reduce fuels across the landscape with an emphasis near private lands and developments to minimize the potential impacts from wildfires.
- Restore, maintain and/or enhance mountain sagebrush and mountain brush communities at a landscape scale.
- Maintain and enhance mature pinyon-juniper and mountain mahogany woodlands.
- Improve and or/maintain watershed function related to springs, streams and other riparian areas.
- Restore fire to wilderness areas and fire dependent ecosystems where appropriate.
- Provide reasonable public access and address potential safety and resource concerns associated with roads and motorized trails.
- Protect archeological resources and protect/stabilize historical resources.

Decision

I find, based on a review of the Currant-Ellison Watershed Restoration Project Environmental Assessment and project record, that the proposed action has no significant impacts requiring the preparation of an Environmental Impact Statement prior to the issuance of my decision to implement (see “Finding of No Significant Impacts” section for details). The proposed action will meet all aspects of the Purpose and Need as outlined above. Based on my review of the EA and the project record, it is my decision to approve the proposed action as described in the EA with the following changes and/or clarifications:

- The use of prescribed fire is not authorized within any designated Wilderness Area within the Project Area. In addition, prescribed fire is also not authorized outside of Wilderness areas if the intent is to allow it to run into wilderness areas. The total acres of prescribed fire treatments will be reduced from 13,500 acres to 2,500 acres (outside Wilderness Areas).
- Wildfires for Resource Benefits may be allowed to burn within Wilderness Areas in accordance with Forest Service Policy.
- No mechanical treatment or cutting of vegetation is allowed within wilderness areas under this decision.
- No watershed treatments are allowed within Wilderness Areas except Mustang Springs (see below).

- The Mustang Springs Enclosure (pipe rail fence) is approved under this decision, however, Motorized vehicles or equipment are not authorized to transport fence material into the Wilderness or during the construction of the fence.
- No mine closures will occur within Wilderness Areas under this Decision.

No motorized vehicle or equipment use of any kind is authorized within Wilderness Areas under this Decision.

My decision will allow a variety of treatments within the Project Area. Appendix A of this Decision includes a Map of the Project Area. Appendix B includes a table and summary of treatments and acres by each unit within the Project Area.

Rationale for the Decision

I have selected the Proposed Action because it fully addresses the purpose and need as outlined in the Environmental Assessment. Additionally, the Proposed Action and associated mitigation measures address comments and concerns raised by the public and interdisciplinary team members during analysis of the project. The Proposed Action improves and restores habitats at a landscape scale for important wildlife species such as sage grouse, desert bighorn sheep, and mule deer. The proposed action also restores and improves important vegetative communities such as sagebrush and riparian areas. The Proposed Action creates fuel breaks and reduces fuels to increase the potential for success in managing wildfires within and adjacent to the Project Area. The Proposed Action also minimizes adverse impacts on resources within the project area.

Public and Other Agency Involvement

Public involvement on this project has occurred throughout the planning and analysis process leading to this document. The proposed project has been listed on the Humboldt-Toiyabe National Forest Schedule of Proposed Actions (SOPA) since April, 2012.

- In December 2012, a scoping notice was sent to 116 individuals, groups, agencies and tribes providing an opportunity to comment on the upcoming Currant-Ellison Watershed Restoration Project on the Ely Ranger District.
- On January 10, 2013 a scoping notice for the Currant-Ellison Watershed Restoration Project was published in the Ely Times. Thirteen comments were received during this comment period.
- In 2013, 2014, and 2015 an update on this project was provided to potentially affected Outfitter & Guide permit holders at the annual meeting.
- In 2013, 2014, and 2015 an update on this project was provided to potentially affected Livestock Permittees at the annual meetings.
- In December 2013, a Notice of Proposed Action was mailed to 87 individuals, groups, agencies and tribes providing an opportunity to comment. Four comments were received.
- On Jan. 10, 2014 a legal notice requesting public comments was published in the Ely Times Newspaper.
- On January 23rd, 2014 a legal notice requesting public comments was published in the Elko Daily Free Press Newspaper.

- Brief updates on this project were presented at 12 Tri County (White Pine, Nye, and Lincoln) meetings between December 2012 and present.
- Brief updates on this project were presented at 12 Coordinated Resource Management (CRM) meetings between December 2012 and present.
- Brief updates on this project were presented at 8 White Pine County Water Advisory Committee meetings between December 2012 and present.
- Brief updates on this project were presented at 11 White Pine County Public Land Use Advisory Committee (PLUAC) meetings between December 2012 and present.

Other Alternatives Considered in Detail

No Action Alternative

Under the No Action Alternative, current management plans will continue to guide management of the project area. No treatments will be implemented to improve wildlife habitats, reduce fuels or improve vegetation conditions. Wildfires will continue to occur and could be managed for resource benefits in accordance with existing policy and regulations. Pinyon-Juniper will continue to increase in density across the landscape. Sagebrush communities will continue to age and will contain limited early seral components.

Alternative 3 No Treatments within Wilderness

This alternative is similar to the Proposed Action, except that no treatments will occur within any Wilderness Areas.

Alternatives Eliminated from Detailed Study

In addition to the proposed action, no action, and alternative 3 evaluated in this document, other management approaches were considered by the IDT in response to preliminary concerns generated from internal and external scoping of the Proposed Action. These alternatives, which were not studied in detail, are described in this section along with an explanation of why the alternatives were not considered further.

Removal or reduction of livestock grazing

Under this alternative domestic livestock would be removed or numbers significantly reduced within the project area. This alternative does not restore fire adapted ecosystems. No treatments would occur to reduce pinyon-juniper densities or encroachment. This Alternative would not reduce fuel loads or reduce wildfire risks to private lands or other important resources. This alternative would also not restore sagebrush ecosystems which are important to species such as sage grouse. This alternative was eliminated because it doesn't allow for restoration within the project area and does not meet the purpose and need for action.

No Treatments within Roadless Areas or Wilderness Areas

Under this alternative no treatments would occur within roadless areas or wilderness areas. Alternative 3 was developed and analyzed to address no treatments within wilderness areas.

Roadless Areas comprise a large portion of the project area and restoration treatments within these areas are critical to meet the purpose and need for this project. This alternative does not restore fire adapted ecosystems. Few treatments would occur to reduce pinyon-juniper densities or encroachment. This Alternative would not significantly reduce fuel loads or reduce wildfire risks to private lands or other important resources. This alternative would also not restore sagebrush ecosystems at a scale needed for species such as sage grouse and mule deer. This alternative was eliminated because it doesn't allow for the scale of restoration within the project area and does not meet the purpose and need for action.

Other Laws, Regulation, and Policy

As summarized below, my decision is consistent with Federal, State, and local laws or requirements imposed for the protection of the environment.

A number of disclosures involving compliance with various applicable laws, executive orders, and regulations are required in NEPA analysis for proposed resource management projects. These disclosures are listed below:

American Indian Treaty Rights—The proposed alternatives would not conflict with any treaty provisions.

Clean Water Act—The Clean Water Act (CWA) is a federal statute that requires states and tribes to restore and maintain the chemical, physical, and biological integrity of the nation's waters (33U.S.C. 466 et seq., Title I, Section 101). The hydrology analysis discloses the potential effects of the alternatives on water quality (EA pages 92-95). Based on the analysis disclosed in this document, both action alternatives will comply with the CWA. This project includes mitigation measures (See Appendix C) to ensure management activities maintain or improve watershed conditions (Chapter 2). The project area contains no 303d listed streams.

Clean Air Act—The Proposed Action is in compliance with the Clean Air Act, 1977 as amended. All required permits would be secured to ensure compliance with federal and state laws. Pollutant emissions will be within state and federal standards.

Consultation with Tribal Governments (E.O. 13175)—Consultation with the Duckwater Tribe, Goshute Tribe and the Ely Shoshone Colony has been ongoing during project analysis.

Endangered Species Act—The project area contains no known populations or potential habitats for any federally listed threatened or endangered species. No federally listed threatened or endangered species occur on the Ely Ranger District.

Environmental Justice (E.O. 12898)—Executive Order 12898 (59 Fed. Register 7629, 1994) directs federal agencies to identify and address, as appropriate, any disproportionately high and adverse human health or environmental effects on minority populations and low income populations. The proposed alternatives would not result in unequal impacts on any part of the population in White Pine or Nye Counties, Nevada and complies with E.O. 12898.

Executive Order 11988 Floodplain Management and Executive Order 11990 Protection of Wetlands—The alternatives will not result in significant adverse impacts on wetlands or floodplains as they relate to protection of human health, safety, and welfare; preventing the loss of property values, and; maintaining natural systems. The goals of Executive Orders 11988 and

11990 would be met. All wetlands would be protected through mitigation measures which conform to Executive Order 11990.

Executive Order 13186 and the Migratory Bird Treaty Act—Both action alternatives would comply with the Migratory Bird Treaty Act. This project may result in an “unintentional take” of individuals during proposed activities; however, the project complies with the U.S. Fish and Wildlife Service Director’s Order #131 related to the applicability of the Migratory Bird Treaty Act to federal agencies and requirements for permits for “take”. This project complies with Executive Order 13186 because the analysis meets agency obligations as defined under the January 16, 2001 Memorandum of Understanding between the Forest Service and U.S. Fish and Wildlife Service designed to complement Executive Order 13186.

Facilitation of Hunting Heritage and Wildlife Conservation (E.O. 13443) – On August 16, 2007, President George Bush signed an Executive Order directing appropriate federal agencies to facilitate the expansion and enhancement of hunting opportunities and the management of game species and their habitat. The action alternatives will result in improved habitats for big game species such as mule deer and elk. The no action alternative will have a long term adverse impact on big game species and would not work to meet the objectives outlined in this executive order.

Inventoried Roadless Areas (IRA)—The 185,000 acre project area includes all or portions of eighteen IRAs. Most of the IRA’s within the Project Area are small remnants of previous, larger IRA’s which became Wilderness in 2006. Neither action alternatives will have lasting effects on the attributes of any of the IRAs (Environmental Assessment, Section 3.7, pages 167-174).

National Historic Preservation Act—Under the Proposed Action there will be no adverse impacts to historic properties (NRHP eligible cultural sites, prehistoric, historic, TCP’s, sacred sites) based on avoidance. All Historic Properties would be avoided during any surface disturbing activities, which typically are incorporated with planned vegetative mosaic patterns. Presently there are recorded Historic Properties that exist within the project area. The risk of damaging an eligible historic property during implementation of treatments is minimal as these sites will be avoided.

This project is covered under the Central Zone Vegetation Management Programmatic Agreement between the USFS and the State Historic Preservation Office (SHPO). The treatment of historic properties by the USFS would follow the standard protection measures listed in Appendix A of the Programmatic Agreement.

Best Available Science—The conclusions summarized in this document are based on a review of the project record that reflects consideration of relevant scientific information and responsible opposing views where raised by internal or external sources and the acknowledgement of incomplete or unavailable information, scientific uncertainty, and/or risk where pertinent to the decision being made.

Humboldt National Forest Land and Resource Management Plan (1986)—The Proposed Action is in compliance with the Humboldt National Forest Land and Resource Management Plan (1986) as amended. See Environmental Assessment pages 16-17.

Climate Change—“The Forest Service is responding to climate change through ecological restoration—by restoring the functions and processes characteristic of healthy, resilient ecosystems.” (Thomas L. Tidwell, Chief April 20, 2010). The purpose of this project is to restore and maintain healthy and resilient vegetation communities, wildlife habitats and to reduce fuels

and wildfire risks near private lands and structures. The prescribed fire portions of this project will result in short term smoke impacts into the atmosphere, however there will be no lasting effects as a result of these actions. The proposed action and design features are designed to restore resilient vegetation communities and ecosystems while minimizing the effects of invasive species. This project will not result in any long-term adverse impacts associated with climate change. Specific actions identified within the proposed action will create more resilient vegetative communities which are viable under changing climatic conditions.

Finding of No Significant Impacts

After considering the environmental effects described in the Curren-Ellison Watershed Restoration Project Environmental Assessment and reviewing the Council on Environmental Quality Regulations for Significance (40 CFR 1508.27), I have determined that this proposal is not a major Federal action that will significantly affect the quality of the human environment, either individually or cumulatively. Preparation of an Environmental Impact Statement pursuant to Section 102 (2) (c) of the National Environmental Policy Act of 1969 is not required. This determination is based on consideration of the context of the proposal and the following factors to be considered when evaluating intensity of the potential impacts, as outlined in 40 CFR 1508.27.

Context:

The project area analyzed in this EA is located on the southern portions of the White Pine Mountain Range in White Pine and Nye Counties, Nevada. Vegetation communities within the project area range from lower elevation shrub communities up to high elevation Bristlecone Pine communities. The total project area perimeter includes approximately 185,000 acres, of which an estimated 30,838 acres would be treated.

The proposed action does not have impacts or influence outside the watersheds within which the project occurs. The proposed action does not have any regional or global implications that would expand the context of the impacts.

Intensity

Intensity is a measure of the severity, extent, or quantity of effects, and is based on information from the effects analysis of this EA and the references in the Project Record. I have determined that the interdisciplinary team considered the effects of this project appropriately and thoroughly with an analysis that is responsive to concerns and issues raised by the public. The team took a hard look at the environmental effects using relevant scientific information and their knowledge of site-specific conditions gained from field visits. My finding of no significant impact is based on the intensity of effects using the ten factors identified in 40 CFR 1508.27(b).

1. Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial.

Our finding of no significant environmental effects is not biased by the beneficial effects of the action. The beneficial effects of fuels reduction and restoration treatments have not been used to balance adverse effects of the treatments. Potential adverse effects were considered in the project mitigation measures to reduce the potential for adverse impacts

and were incorporated into the proposed action. The mitigation measures are specifically included to minimize or eliminate potential adverse impacts caused by the treatments. Effects determinations were made independently from the beneficial effects of the treatment, but considering the mitigation measures incorporated into the Proposed Action. A discussion of the potential effects is summarized in Table 5 of the EA (pgs. 33–37).

2. The degree to which the proposed action affects public health or safety.

Implementation of this project will reduce threat to public health and safety from high severity wildland fires. Treatments are designed to increase the resiliency of the vegetation communities which will improve habitat for a variety of wildlife and plant species. Treatments on roads will also reduce potential water quality impacts and will ensure reasonably safe travel conditions for Forest users.

These fuels reduction treatments will achieve improved public health and safety by reducing the intensity of wildfires and their resistance to control by fire suppression efforts. Implementation of the Proposed Action will be governed by public health and safety standards and contract clauses.

Intense smoke emission and subsequent negative impacts on air quality experienced during severe wildfire events will be reduced by decreasing the potential for these events to take place. Smoke and air quality effects from project implementation cannot be completely eliminated, however impacts will be significantly reduced from wildfire effects. Burn plans addressing public safety and air quality will be completed in cooperation with local firefighting and air quality agencies prior to prescribe burning.

(See Environmental Assessment, Mitigation Measures page 26)

3. Unique characteristics of the geographic area such as the proximity to historical or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers or ecologically critical areas.

There will be no significant effects on unique characteristics of the area. Parklands, prime farmlands, wetlands, wild or scenic rivers or ecologically critical areas are not present within the analysis area.

Historic and cultural resources within the project area have been surveyed and analyzed, and found not to be significantly affected by the project or will be avoided during treatments.

Appropriate mitigation measures have been incorporated into the proposed action to mitigate impacts to cultural resources within the project area (See Appendix C).

This project contains all or parts of four wilderness areas. The proposed action and alternatives have been designed to minimize impacts on designated wilderness areas (See EA, pages 174-181).

The proposed action has been developed to restore streams and riparian areas within the project area.

4. The degree to which the effects on the quality of the human environment are likely to be highly controversial.

The effects on the quality of the human environment are not likely to be highly controversial because there is no known scientific controversy over the impacts of the project. Concerns were raised regarding this project and potential impacts to wildlife species and wilderness areas. The proposed action was designed to improve habitats for various wildlife species like sage grouse and those treatments are generally supported by current science and experts within various agencies related to the management of wildlife species and habitats.

The potential effects of this project on wilderness areas were also raised as a potential concern. The District worked closely with the commenters to address their concerns. An objection was submitted which raised concerns regarding the potential impacts of this project on Wilderness. The use of prescribed fire within Wilderness Areas was removed from the Decision. Additional Clarification regarding Wilderness Areas was incorporated into the Decision. The effects of implementation of this decision on the quality of the human environment are not likely to rise to the level of scientific controversy.

5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

The Forest Service (FS) has considerable experience with the types of activities to be implemented. The effects analysis shows the effects are not uncertain, and do not involve unique or unknown risk. The proposed activities are routine in nature, employing standard practices and protection measures, and their effects are generally well known. This is meant in no way to nominalize the risk that is inherent in the use of prescribed fire, however relative to the highly unpredictable nature of wildfire during high or extreme fire weather conditions, those risks are far more certain and manageable

6. The degree to which the action may establish precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The action is not likely to establish a precedent for future actions with significant effects, because this action is not unusual and does not represent a decision in principle about future considerations. This action is the project level implementation of the Humboldt National Forest Land and Resource Management Plan (USDA 1986) and helps move the project area toward the desired future conditions identified in the plans.

7. Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

Cumulative effects of this action were discussed in the Cumulative Effects sections of the EA and specialist reports. Appropriate mitigation measures have been incorporated into the proposed action to mitigate direct, indirect and cumulative impacts of the project. No cumulatively significant impacts were discovered during preparation of the Environmental Assessment. Although there will be individual short-term effects, the proposed action will not contribute cumulatively to significant adverse effects.

8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

Under the Proposed Action there would be no adverse impacts to historic properties (NRHP eligible cultural sites, prehistoric, historic, TCP's, sacred sites) based on avoidance. All Historic Properties will be avoided or impacts mitigated during any surface disturbing activities, which typically are incorporated with planned vegetative mosaic patterns. Presently there are recorded Historic Properties that exist within the project area. The risk of damaging an eligible historic property during implementation of treatments is minimal.

This project is covered under the Central Zone Vegetation Management Programmatic Agreement between the USFS and SHPO. The treatment of historic properties by the USFS would follow the standard protection measures listed in Appendix A of the PA.

The Ely Shoshone and Duckwater Shoshone Tribes have been consulted on the project. The district maintains open communication with the tribes concerning potential discoveries during project implementation.

9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

It has been determined that no federally listed threatened or endangered species occur within the proposed project area or on the Ely Ranger District.

10. Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.

This action was designed to be in compliance with federal, state, and local law. For a listing of environmental protection laws considered in the project design see the "Other Laws, Regulations and Policy" section above.

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Date

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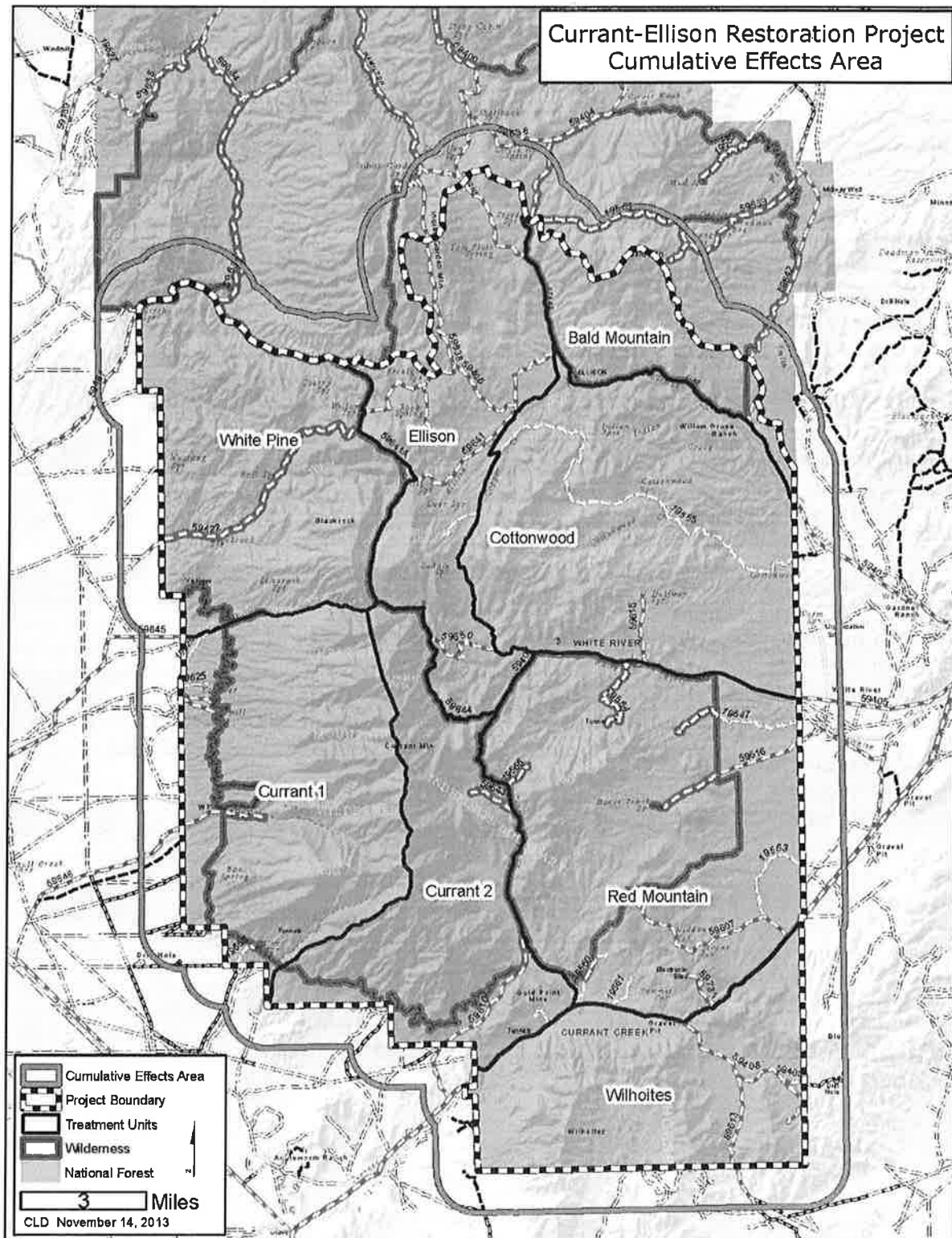
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Appendix A: Project Area Map



Appendix B: Treatment Acres by Unit

Treatment Type	Acres/Mileage
Bald Mountain Unit (8208 Acres)	
Unauthorized Route Rehabilitation	Up to 0.5 Miles
Vegetation Treatments (Mechanical/Hand Cutting)	Up to 200 Acres (Fuel breaks along road corridors and outside Wilderness)
Watershed Treatments	14.7 Acres
Cottonwood Unit (31,174 Acres)	
Halogeton Treatments/Drill Seeding	171 Acres
Unauthorized Route Rehabilitation	Up to 15 Miles
Vegetation Treatments (Mechanical/Hand Cutting)	Up to 5500 Acres
Watershed Treatments	199 Acres
Ellison Unit (21,241 Acres)	
Prescribed Fire	Up to 2500 Acres
Unauthorized Route Rehabilitation	Up to 30 Miles
Vegetation Treatments (Mechanical/Hand Cutting)	Up to 3000 Acres
Watershed Treatments	281.5 Acres
Currant 1 Unit (25,925 Acres)	
No Treatments	
Currant 2 Unit (20,363 Acres)	
Abandoned Mines	26 Acres
Unauthorized Route Rehabilitation	0.5 Miles
Vegetation Treatments (Mechanical/Hand Cutting)	Up to 1200 Acres
Watershed Treatments	6.5 Acres
Red Mountain Unit (34,904 Acres)	
Unauthorized Route Rehabilitation	Up to 2 Miles
Vegetation Treatments (Mechanical/Hand Cutting)	Up to 1500 Acres
Watershed Treatments	19.5 Acres
White Pine Unit (23,479 Acres)	
Vegetation Treatments (Mechanical/Hand Cutting)	Up to 200 Acres (Fuel breaks along road corridors and outside Wilderness)
Unauthorized Route Rehabilitation	Up to 2 Miles
Watershed Treatments	13 Acres
Wilhoites Unit (19,627 Acres)	
Vegetation Treatments (Mechanical/Hand Cutting)	Up to 5000 Acres
Unauthorized Route Rehabilitation	Up to 2 Miles
Total Treatment Acres (184,921 Project Area Acres)	
Halogeton Treatments/Drill Seeding	171 Acres
Unauthorized Route Rehabilitation	Up to 52 Miles
Vegetation Treatments (Mechanical/Hand Cutting)	Up to 16,600 Acres
Watershed Treatments	534.2 Acres
Prescribed Fire	Up to 2,500 Acres
Abandoned Mines	26.5 Acres

Appendix C: Mitigation Measures

Mitigation measures have been developed to ensure the project maximizes the benefits and minimizes the risks to resources in the project area.

Wildlife:

- Establish a minimum of a 250-acre protection area around any active goshawk nests. Also, establish an appropriate aircraft buffer around any active goshawk nests during spring or early summer burns to prevent disturbance to the nesting birds. Goshawk nesting surveys will be done before prescribed fire is used in potential nesting habitat.
- No prescribed fire ignitions in pure mountain mahogany stands identified on the H-T current vegetation map and on the ground; avoid burning these stands which provide important wildlife habitat
- Prescribed fire and mechanical treatments will not target sagebrush communities which do not contain a pinyon-juniper or white fir component.
- Ensure that ignition activities for prescribed burning are less than 2 weeks in duration within treatment units to allow for migratory birds that may lose their nest to re-nest.
- If mechanical treatments are implemented during the breeding season (May 1 to July 15), nesting bird surveys will be done and breeding territories found will be flagged and avoided.
- Leave and maintain large, cone-bearing pinyon trees in patches within the treatment area for the pinyon jay, black-throated gray warbler, and the juniper titmouse. Large stands of pinyon will remain within and adjacent to the project area.
- Prescribed fire will not be used in occupied habitat for pygmy rabbits. Trees in these areas may be removed with chainsaws and be accessed by foot.
- Survey for bats prior to mine closures.

Heritage Resources:

- Avoid burning known historic wood features within the project area. Hand clearing of vegetation around these features may be done as needed to protect the sites.
- Avoid active ignition of other known cultural sites.

Noxious and Invasive Weeds:

- Prescribed fire treatments will be encouraged during spring; avoiding south facing slopes in areas where cheatgrass is abundant. If cheatgrass is present it will likely increase over time.
- Treatment of known infestations with herbicide before and after implementation will occur and will help limit the further establishment and spread of invasive and noxious weed species.
- Inventoried invasive and noxious weed infestations will be flagged and avoided to reduce the expansion of undesirable species.

- To mitigate ground disturbance during mastication, track equipment operators will avoid making abundant sharp right angle turns, instead utilize a gentle curved pattern with the lowest possible sharp angles during implementation to reduce ground disturbance.
- In areas where jackpot burning will be applied, monitoring will be implemented before and after treatment and any infestations of noxious or invasive weeds will be treated.
- The District Weed Coordinator will complete follow-up monitoring within the Currant-Ellison Watershed Restoration Project Area following completion and at regular intervals to determine the persistence, reoccurrence or spread of invasive and noxious weeds.
- Inventory of new and existing populations of undesirable species will continue to be recorded and treated along existing roads being used during and after project implementation.
- To ensure continuation of an integrated pest management program across the project area, additional funding opportunities will be pursued through collaboration with; Rocky Mountain Elk Foundation, Mule Deer Foundation, and other potential partnerships.
- During implementation, vehicles entering and leaving the project area will be washed to avoid transmission of invasive and/or noxious weed seeds.
- As needed, control of noxious weeds and invasive species would be done under the Forest's approved treatment program.

Vegetation:

- No ignition will occur on rocky outcrops to avoid burning rare plant communities
- Seeding of native grasses and forbs may be done following treatment to provide additional seed sources for vegetative recovery. Non-native species may be included in the seed mix for the Halogeton Treatments.

Range:

- In areas where prescribed fire and/or where re-seeding is employed, a mandatory two year rest will be implemented as designated by the Forest Plan.
- In areas where mechanical methods are used, adjustments will be made to lessen impacts by livestock. Adjustments may include temporary head month reductions, changes in rotation of livestock operations, and resting areas where re-seeding has occurred.

Soils/Air/Water

- Skidding or other activities that would tend to loosen the soils will not occur on slopes over 25%. Skidding across drainages will be avoided where feasible.
- Protect water quality through the use of BMPs, which are employed by the Forest Service and the State of Nevada to prevent water quality degradation and to meet state water quality objectives relating to non-point sources of pollution. In addition, use site-specific mitigation measures that relate directly to these BMPs to minimize erosion and resultant sedimentation.
- For ephemeral streams that do not show scour and deposition employ streamside management zone (SMZ) widths of 25'. Harvesting equipment is excluded from this area. Equipment may reach into the exclusion zone to remove material.

- Exclude equipment from channels, except at equipment crossings, unless specifically allowed for in the environmental document. Minimize the number of crossings. Crossings will be back-bladed after use, as necessary, to restore the natural relief and reduce erosion.
- Remove any slash generated by project activities from stream courses as soon as practicable unless specifically allowed for in the environmental document.
- Do not locate landings within channels. Mulch and then sub-soil landings and other disturbances within 200 feet of stream channels.
- Remove no trees adjacent to channels that provide bank stability and/or contribute to channel integrity (except for hazard trees).
- Drainages breached, rerouted, or infilled by existing and activity related landings, skid trails and temporary roads would be restored to their natural contour. This would occur during sub-soiling operations.
- Do not locate skid trails parallel to the bottom of swales. Treat swales as stream courses, crossing at right angles and skidding away from these features.
- Retain at least 90% of large woody debris in channels and leave 50-75% of the ground unburned within the interior 50' of drainages. Within these core areas, ensure that burned areas appear intermittent, not concentrated. Maintain a minimum of 75% ground cover over stream channels. Locate burn piles outside of the "green line" or at least 25' away from channels having evident scour and deposition, whichever is greater. Burn piles prior to under burning.

Public Safety:

- Roads within the project area may be closed to the public for the brief time that operations are in progress.
- Signs would be posted as would a notification through public media.
- Local residents and permittees would be notified.
- The project area would also be checked and cleared of any campers, hunters, and any other recreational users that could be impacted by any of the types of treatments.

Wilderness:

- The use of motorized or mechanized equipment related to unauthorized route rehabilitation is prohibited within wilderness areas.
- Non-native seed will not be used within wilderness areas.

Appendix D: Response to Comments

Currant Ellison Watershed Restoration Project

Response to Comments from the NOPA Comment Period

Published in the newspaper of record, The Elko Daily Free Press Jan. 23rd, 2014

Received Four (4) Letters During this scoping Period

Letter 1-Comment by Curt Leet at a Public Land Use Advisory Committee meeting.

Comment 1: U.S. Forest Service should utilize prescribed burns and forgo hand cutting within aspen stands.

Response: Thank you for your comment. The amount of aspen acreage within the Currant Ellison Watershed Restoration Project is quite small. It is unlikely that hand cutting would be utilized to stimulate aspen regeneration due to the size of existing stands. The location of many of the stands are high elevation and within wilderness and is being looked at closely for prescribed burning.

Letter 2 Submitted By Bill Wolf

Comment 2-1: I support this project. My concern is with the design of PJ harvesting. I believe the design the agency has implemented on the lower slopes on the east side of Ward Mountain is inappropriate and I hope it will not be duplicated in the Currant-Ellison Project.

Response: Thank you for your support. The Ward Mountain P/J cutting project your reference was one of the first conducted on the Ely Ranger District and a considerable amount of information regarding implementation, lay-out, and overall design has been learned by all the resource specialists involved in these types of projects. We will be implementing these lessons learned as we move into implementation within the Currant-Ellison Watershed Restoration Project.

Comment 2-2: It is my hope that the agency, when thinning late stage 1 along with stage 2 and 3 PJ, will take a more naturalistic approach to the design. Instead of a polka-dot design I would hope the agency would clear blocks but at the same time not have linear borders. If one looks across Steptoe Valley from the Ward project you can see how PJ naturally seems to follow the drainages as it expands into the sage steppe. This results in sinuous stringers of trees. I believe this has several benefits beyond the visual. It seems to me that the stringers also function as living snow fences to help capture drifting snow along the drainages as provide slower release of snowmelt. The polka-dot pattern would also see to discourage use of the lower slopes by sage grouse whereas thinning the trees into stringers could provide open areas more amenable to use by sage grouse. My limited knowledge of wildlife also suggests that the stringers provide better cover for elk and deer as they move up and down the slopes. Over time, the brush component should become denser as more water is available from the removal of the trees. This will happen with the polka-dot thinning or the more naturalized approach I advocate. My experience in fire management suggests to me that it would be easier to manage fires in a continuous brush field rather than a brush field interspersed with mature trees that would likely be torching completely. Control lines within the brush field would only need to be sized to the brush and not the tree component. Additionally, along the stringers one often finds an edge effect from the trees out-

competing brush, grass and forbs which results in a slight break in the continuity of fuels. This break in continuity is especially useful in low intensity fires.

Response: Late stage 1 P/J canopy cover removal has been ongoing through smaller projects that fall within the Currant Ellison Watershed Restoration Project. Most, if not all, of these phase 1 p/j removal projects have resulted in much greater open sagebrush areas. The effect to the visual is minimal and in some cases a person may not even be able to tell that anything has been cut. This however, is not the same for the denser canopy cover found in Phase 2 and 3 P/J. Through the various projects that the Ely RD has been implementing within Phase 2 and 3 P/J we have begun to design the implementation a bit differently. Instead of wholesale clear-cutting, we are now leaving islands of trees within large blocks of cutting, as well as, long thin stringers where the terrain allows. Further, in the phase 3 p/j canopy cover type we are only “feathering” the cutting into these areas as a way of poking holes into it to slowly allow for the understory component to begin reestablishment. We are striving to not leave such a linear footprint on the landscape as you suggest has been the case in the past.

Letter 3- Submitted by John Breitrick

Comment 3-1: The Currant Ellison Restoration Project is inadequate and lacking in several of the proposals. The unit maps do not show locations of most of the proposed treatments.

Response: The Environmental Assessment will contain more detailed information regarding proposed treatments and locations.

Comment 3-2: The proposed project calls for 16,600 acres of vegetation treatment by mechanical and hand-cutting methods. None of the acreage proposed for these treatments are shown on the maps provided. The areas for personal fuel-wood harvest, commercial green fuel-wood harvest and mechanical treatments such as mastication are not shown.

Response: The Environmental Assessment will identify proposed treatments and acreages of treatments by treatment units.

Comment 3-3: None of the 13,500 acres proposed for prescribed fire treatments are located on the maps.

Response: The Environmental Assessment will identify proposed treatments and acreages of treatments by treatment units.

Comment 3-4: The maps do not clearly indicate which springs and where on the stream habitats where riparian restoration will take place, particularly those areas which may involve the use of equipment, and those areas where road relocation and/or rehabilitation may occur.

Response: The Environmental Assessment will contain more detailed information regarding proposed treatments and locations.

Comment 3-5: The road system is not shown on the maps. The maps do not show where the level 3, 2, and user created roads mentioned in the proposal are located. None of the proposed 52 miles of road closure or rehabilitation are indicated on the maps. Neither closed user created roads nor open user created roads are distinguished and shown. Most of the roads in the proposal area are user created roads-many created more than 100 years ago. These roads are historical and should be preserved. Roads where vegetation will be cut back are not shown.

Response: All routes not currently authorized by the 2009 Travel Management Decision will not be shown on any maps unless specifically targeted for rehabilitation and physical closure. For the purposes of this project, we disclosed that we would be rehabilitating up to 52 miles of existing closed routes. Road Maintenance is ongoing within the Project area annually based upon priorities and funding. Trail maintenance is ongoing year to year and all of the authorized motorized trails within this project area have been targeted for maintenance through annual trail maintenance plans. Only authorized motorized roads open to all vehicles will receive maintenance under this project proposal.

Comment 3-6: The time period for public comment is poorly scheduled and inadequate. A 30 day comment period in January when the public cannot access the forest to examine proposed actions that will take years to implement is unacceptable.

Response: This is the second of two formal Scoping periods. The first comment period occurred in December of 2012 which left the commenter over a full year to go to the project area and become familiar with the area. Additionally, a project briefing has been presented at numerous PLUAC, CRM, Tri-County and other public meetings over the past several years.

Letter 4- Submitted on behalf of Wilderness Watch by Gary MacFarlane

Comment 4-1: We believe the project as proposed is contrary to the letter and spirit of the Wilderness Act. Please note our comments are directed at the Wilderness portions of this proposal.

Response: Thank you for your comment.

Comment 4-2: The large size of the proposal and project area-185,000 acres, much of which is designated Wilderness-clearly points to the necessity of an EIS.

Response: Size and scope of a project are not what determine whether an EIS or an EA are necessary. What drives the differentiation is the determination of whether or not there are significant adverse effects that cannot be otherwise remedied, avoided, or mitigated in any meaningful way.

Comment 4-3: There is considerable scientific controversy, indicating an EIS is needed. Research that supports a fairly large extent of pinyon juniper woodlands in pre-settlement times is The Historical Stability of Nevada's Pinyon-Juniper Forest by Ronald M. Lanner, a retired forestry professor from Utah State University, and Penny Frazier (Phytologia, Dec. 2011, vol. 93, pp. 360-387) (see attached). Thus the rationale for this project is suspect both scientifically and in terms of wilderness-compatibility.

Response: Thank you for your comment. However, one dissenting view point among a multitude of supporting viewpoints does not mean that there is controversy. There is significant research, including ongoing research that supports much of the work that is proposed within this project and in others proposed across the State of Nevada. Potential effects of this project will be disclosed within the Environmental Assessment.

Comment 4-4: Two alternatives that should be analyzed include an alternative that does not involve management actions in the Wilderness, and an alternative that defers livestock grazing until riparian recovery occurs.

Response: We fully agree. A third alternative has been added to the Currant Ellison Watershed Restoration Project that considers no management actions within wilderness. We will consider

your alternative proposal as it relates to livestock grazing, however, an EIS and Decision Notice is in the process of being finalized related to the management of livestock grazing. Therefore for the most part the management of livestock grazing is outside the scope of this analysis.

Comment 4-5: The Currant Ellison project could allow a level of manipulation and trammeling of the Currant Mountain, White Pine Range, and Red Mountain Wildernesses not permitted by the 1964 Wilderness Act.

Response: Thank You for your comment, however, we disagree with your statement. The 1964 Wilderness Act does not prohibit activities which could manipulate or result in a trammel of a wilderness area. We are required to follow specific processes and procedures and must disclose the potential effects of this project. Additionally, specific design features and mitigation measures will be included to minimize the potential effects on wilderness areas.

Comment 4-6: Wilderness Watch supports allowing lightning-caused fire to play its role in these four wildernesses but the Forest service plan proposes to significantly manipulate wilderness in ways that will destroy the areas wilderness character, in violation of the mandate of the 1964 Wilderness Act. The proposed action would apparently allow human-ignited fire in three of these wildernesses. It is unclear whether human-ignited fire would be allowed to enter Bald Mtn Wilderness.

Response: Thank you for your comment but we disagree. We are not planning on implementing unrestricted prescribed fire within any of the wildernesses. We are conducting a very thorough analysis of the current vegetation conditions, and other resources of significance that together make the wilderness character of each separate wilderness area unique. We are also looking to put fire back into these wilderness areas in such a manner that mimics lightning caused fires, such as the use of a heli-torch. The 1964 Wilderness Act does not prohibit activities such as prescribed fire within a wilderness area. Any use of prescribed fire will be done in a way mimicking a wildfire while minimizing some of the potential adverse impacts that may result from wildfire in a human altered environment which is the case in these wilderness areas. Prescribed fire is currently not proposed within the Bald Mtn. Wilderness. A previous fire did great environmental damage within this particular wilderness a number of years ago. Cheat grass and other noxious weed species have invaded the old fire scar.

Comment 4-7: The proposed action, even where agency-ignited fires are allowed to burn into wilderness, ignores any impacts to the untrammelled, unmanipulated wilderness character of the four wildernesses. Even if agency-ignited fire may bring some perceived ecological or species-specific benefits, human-ignited fire in Wilderness is a significant manipulation or trammeling of the area. This is true whether fire is ignited in the Wilderness or just outside with the intent it would burn into the Wilderness. The Forest Service plan has the potential to turn these Wildernesses from wild landscapes into heavily manipulated, managed forest and rangeland. Allowing the Wilderness to evolve of its own accord and letting lightning-caused fire play its natural role is a much better alternative.

Response: The proposed action with regards to prescribed fire very much is a trammeling, but so is suppression. When we suppress a fire we are not allowing natural processes to occur as they would. Continual suppression, such as what has occurred for the past century, has created Unnatural characteristics within these wilderness areas and has put them at greater risk of devastating fire effects that may forever change not only the wilderness character but the entire ecosystems within them. We must balance all of the factors that make up wilderness character

carefully and make the determination of what is most important in the long term, a functional watershed that provides invaluable ecosystem services and wildlife species, or whether or not man puts his hand in the mix or not. We feel that in the best interest of these ecosystems that some short term manipulation to re-direct the degradation that is occurring to a more sustainable, natural trajectory that occurs over a longer term is desirable. By allowing suppression of fire to continue and then leave wilderness to operate on its own accord is both hypocritical and detrimental to the overall vitality and viability of the wilderness area into the future.

Comment 4-8: Natural Fire should be allowed to play its role in wilderness and human-ignited fires, either in wilderness or adjacent to wilderness with the intent of going into Wilderness should not be allowed.

Response: We have determined that most of the wilderness areas within this project area are available for natural fire to play its role. However, in the event that conditions (weather, fuels, resource availability) do not allow for natural fire to occur, the US Forest Service is proposing to use prescribed fire within wilderness to meet those objectives when natural fire conditions must be suppressed. Over the past two years the Ely Ranger District has stepped up to the plate and proven our support for allowing natural fire to play a role within wilderness with the management of 3 large fires for resource benefit in three separate wilderness areas on the District. This is where we want to go into the future; however, you cannot just say one day we will allow natural fires to burn after over 100 years of effective fire suppression. This proposed action allows us to move that direction in a more structured way to minimize the potential for catastrophic adverse effects.

Comment 4-9: The proposals to create fuel breaks raise several questions. For example, there would be fuel breaks constructed along the boundary of the Bald Mountain Wilderness, along a road, which parallels the boundary, even though no burning is proposed in this unit. Is this being done to prevent agency-ignited fire from entering the Bald Mtn Wilderness? If so why isn't that being done for all the other Wildernesses if the goal is to allow Wilderness to be defined by natural rather than human-ignited fire? If it is being done to prevent natural fire from exiting wilderness, why have non-wilderness fire ignitions if the agency is so certain that natural fire will play a role in these areas?

Response: Fuel Breaks are being proposed along roads near the Bald Mountain Wilderness as well as other wilderness areas in the project area. No fuel breaks are proposed within the boundaries of any wilderness area. The Ely District is moving towards a setting where natural fire can play its role within many of these wilderness areas. Allowing fires to play a more natural role, however, does not mean that management of fires and in some cases the need to suppress fires does not exist. The fuel breaks will provide management points to help us implement management decisions regarding wildfires in a safe manner.

Comment 4-10: Similarly, how wide are the fuel breaks and what guarantees are there that they won't go into Wilderness?

Response: The wilderness boundary was set during the designation process at 100' from the roads edge. When these particular projects are implemented the Wilderness Manager will be onsite to ensure that no mechanical cutting occurs within the wilderness boundary.

Comment 4-11: Can't the proposed human-ignited fires outside of the wildernesses be conducted so that no fuel breaks are needed to prevent fire from either entering the wildernesses or damaging other resources?

Response: The fuel breaks that are proposed are not needed to control prescribed fire. Their purpose is to create an anchor point related to the management of wildfires in the area. Any fuel breaks necessary to contain management ignited fire outside of wilderness would vary from man-made to natural vegetation type changes to rocky outcrops or cliffs. Fuel breaks around historic structures would be considered depending on the importance of the structures, as well as, particular habitats would also be avoided or a fuel break may be created to protect it.

Comment 4-12: Does the agency have a natural fire program for this mountain range? If not, why not, given the apparent desire of the agency to want fire on the landscape, including in Wilderness, and the apparent lack of conflicting resource values that would preclude natural fire?

Response: Yes, we have identified that most of the wilderness areas within the White Pine Range Management Unit are open to allow fire to play a more natural role. The exception is the Bald Mountain Wilderness due to existing resource concerns regarding invasive annual grasses and other noxious weeds. The District has been very active in managing wildfires for resource benefits within Wilderness as mentioned in the response to comment 4-8 above.

Comment 4-13: Rather, the proposal would put into place an unnatural fire regime with ignitions in the spring, rather than summer and fall when fires are more likely to naturally occur. These projects could go on in perpetuity.

Response: Over 100 years of fire suppression, climate change, vegetation changes and other factors such as livestock grazing has created an environment that is not natural on this landscape. The proposed action will look to use fire in a way which will move the landscape further to a point where natural fire can play its role without creating additional resource concerns or consequences. The use of prescribed fire may occur during any season of the year to meet those objectives. For example, the use of prescribed fire in the spring would minimize potential impacts from cheatgrass.

Comment 4-14: Two factors deserve consideration. The first is whether there is a threat to resources outside of the Wildernesses and if this project would reduce that threat.

Response: Pinyon-juniper encroachment is threatening the health and vitality of sagebrush communities which further impacts wildlife species of all kinds including sage grouse, elk and deer. Wildfires also poses a threat to sagebrush dependent species like sage grouse both within and outside of Wilderness. This proposal will address those threats and impacts.

Comment 4-15: The second is an analysis of the issues involved, including the first, to see if in fact, agency-ignited fire is allowed by the Wilderness Act and its subsequent regulations.

Response: Thank You for your comment. The 1964 Wilderness Act does not prohibit management activities within a wilderness area. We are required to follow specific processes and procedures and must disclose the potential effects of this project. Additionally, specific design features and mitigation measures will be included to minimize the potential effects on wilderness areas.

Comment 4-16: The wilderness act allows management actions to be taken in the control of fire, insects and disease (Section 4(d)(1)). This allowance is not without limitation, however. In the

case of controlling insects, for example, the Courts have held that controlling insects within Wilderness to protect forests outside Wilderness (an “outside interest”) is inappropriate unless the agency shows that the “outside interest” has taken equally intensive efforts to control insects on non-wilderness lands (see *Sierra Club v. Lyng*, Civ. No.85-2226). Also, Forest Service policy prohibits the use of management-ignited fire for the purpose of enhancing wildlife habitat (FSM 2324.22.7).

Response: Correct. However, Forest Service Policy allows for the use of management-ignited fire for the purpose of enhancing wilderness character. Wilderness character is comprised of multiple considerations: untrammeled, natural, undeveloped, opportunities for solitude or primitive, unconfined recreation and then there are unique characteristics that should be considered. Sometimes these unique characteristics are in fact wildlife species being present. While actions are not taken for the sole benefit of one of these aspects, they all must be considered together. We must determine what level of compromise is acceptable. We have trammled the wilderness since before wilderness was a concept. We have been trammeling wilderness since we coined the term and made designations by allowing on-going grazing and fire suppression efforts. In order to provide an enduring resource of wilderness sometimes we have to take trammeling actions to preserve or protect the Natural aspects, the undeveloped nature, the opportunities for solitude and unique aspects of these areas.

Comment 4-17: The proposal to cut trees in Wilderness ostensibly for riparian restoration is inconsistent with allowing natural processes to define Wilderness.

Response: There is no proposal to cut trees within wilderness in this project. Any and all riparian restoration work that utilizes cut trees will occur outside of wilderness where trees are over-crowding the spring source or along riparian corridors. Only three springs within wilderness have been identified as needing some sort of action. Generally, this only includes an exclosure to protect the site. If materials are not near they will be brought to the site from sources outside of the wilderness. These actions are necessary due to unnatural processes (cattle grazing, wild horses trampling springs) impacting the natural processes (springs flowing and healthy/functioning riparian vegetation) within these sites.

Comment 4-18: Further, the maps are unclear as to whether certain other projects would or would not occur in Wilderness. The NEPA document needs to clearly address this issue with detailed maps. For example, according to the online maps at wilderness.net, some of the proposed cutting units (called watershed treatments) are inside the Wildernesses, not outside. The same may be true of some of the mine closures.

Response: When the draft EA is published acreages of treatments will be identified by units. Any proposed actions within Wilderness will be clearly identified and analyzed. There are no cutting units within wilderness in this project.

Comment 4-19: The proposal also calls for rehabilitating unauthorized routes. Would heavy machinery be used in any of the wildernesses?

Response: No. All route restoration/rehabilitation within the wilderness boundary will be conducted with hand tools and hand crews and utilize a variety of treatments such as but not limited to, pitting of the road way to de-compact the ground and turn-up the existing seed bed, the use of existing dead and downed vegetation (vertical mulching) to hide the route corridor from a visibility stand point, transplanting vegetation from a broad area in the geographic area

and closure of the route well before the wilderness boundary utilizing boulders and other closure methods.

Comment 4-20: The distinctive and distinguishing characteristic of Wilderness is wildness. This fundamental tenet must guide the analysis and decision.

Response: Years of fire suppression and other management actions coupled with factors like climate change within these landscapes and wilderness areas have left these areas at risk and in conditions which are not acceptable. As it relates to Wilderness areas, this project proposes some actions to move these areas closer to a condition where natural functions can generally occur on the landscape with minimal human management. Given the current conditions and factors to say “just let mother nature take care of it” is not acceptable and puts significant risks on the resources and values that make up those wilderness areas. The Ely Ranger Districts commitment to moving towards our goals in wilderness are very evident through our commitment over the past several years to using fire for resource benefits in multiple wilderness areas on the unit.

Comment 4-21: The FS should fully analyze the negative impacts to wilderness character from the extensive manipulation and trammeling of the wildernesses, including imposing human ignitions in the wildernesses, cutting trees and manipulating vegetation.

Response: Correct, the Wilderness Specialist on the Ely RD will be analyzing these impacts as well as any positive impacts that can be identified in the Wilderness Specialist Report. As a reminder no cutting of trees or other similar treatments are planned within the wilderness areas.

Comment 4-22: The FS should conduct its burns well outside the Wildernesses. Further, the Forest Service apparently believes that reducing fuels outside the wildernesses would allow natural fire to play its role in the Wildernesses.

Response: The Forest Service is treating fuels outside the wilderness to help protect resources and developments such as private lands, communications sites, guard stations, archeological and historic sites, and important wildlife habitats for species like sage grouse. Managing fuels outside wilderness areas allows for improved management alternatives and improves the safety for firefighters in the event of a wildfire.

Comment 4-23: All burning plans should include measurable and quantifiable objectives, with a mandated monitoring plan, so the success of any burn in achieving the project’s goals can be readily determined.

Response: Thank You for your comment. We agree.

Comment 4-24: The analysis under the proposed burning plan should clearly determine when human-ignited burns will have accomplished their goals and when only lightning fires will be allowed to burn in the wildernesses.

Response: Thank You for your comment. We agree.

Comment 4-25: The environmental impact statement must assess whether the agency’s plan for prescribed fire matches the area’s historic fire regime in terms of fire intensity (such as ground fires versus stand-replacement fires), fire frequency and return intervals, and time of year that most fires historically burned in the area.

Response: We disagree. The historic fire regime has been altered from the past century of fire suppression efforts which has created an un-natural condition. A careful evaluation of the fire

regime interval and historic fire frequency is a good starting point to work from. The objectives of the management ignited fires is to move vegetation and fuels resources closer to sustainable goals where natural fire can play its role on the landscape.

Comment 4-26: The plan should require a Minimum Requirements Decision Guide/ minimum tool analysis for each non-conforming use that the agency proposes, for example, for chainsaw use within the wildernesses to cut trees or aerial ignition via plane or helicopter.

Response: We agree, this is existing policy.

Comment 4-27: The environmental impact statement must analyze whether natural lightning-caused fire alone can be used to restore fire to the ecosystem.

Response: A third alternative was developed to address no management actions within the wilderness.